

1 THE HONORABLE MARSHA J. PECHMAN
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13 UNITED STATES DISTRICT COURT
14 WESTERN DISTRICT OF WASHINGTON
15 AT SEATTLE

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17 MATTHEW ADKISSON, an individual,
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19 Plaintiff,

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21 v.
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23 EPIK HOLDINGS, INC., a Washington
24 Corporation; EPIK INC., a Washington
25 Corporation; MASTERBUCKS LLC, a
26 Wyoming company; ROBERT W.
27 MONSTER, an individual; and BRIAN
28 ROYCE, an individual,
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30 Defendants.
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33 No. 2:23-cv-00495 MJP
34 DECLARATION OF DEBRA ELLIOTT
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36 I, Debra Elliott, declare:

37 1. I am the founder and director of Life Light Create, LLC, a South Dakota
38 company. Life Light is a full-service, one-stop shop for website design and development needs.

40 2. Life Light first began to use Epik's domain registrar services in August 2021. As
41 of January 2023, Life Light had a portfolio of approximately 300 domain names registered using
42 Epik's registrar services. One of the services offered by Epik is to renew domain names for a
43 small fee before they "expire." This is meant to ensure that a third party is not able to buy the
44 domain name after it expires. This is an ordinary service offered by domain name registrars.
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DEBRA ELLIOTT DECLARATION
(NO. 23-CV-495 MJP) – 1

3. In or around March 2023, I paid a total of \$314.67 to Epik to renew approximately eighteen domain names. However, the domain names I paid Epik to renew were not renewed. On March 25, 2023, I notified Epik that the domain names I paid to renew were not being renewed. I then kept notifying them of this issue over the next several days, flagging that the domain name registrations were expiring soon. Despite notifying Epik of the issue, multiple of the domain names expired after I had paid to renew them. As a result of Epik not renewing the domain names, I transferred the domain name portfolio to a new registrar, incurring over \$2,500 in fees. This loss has directly affected my business, and caused me immense frustration.

4. When I contacted Epik for a refund because of their failure to renew the domain names, instead of providing a refund, Epik provided only in-store credit.

**I declare under penalty of perjury that the foregoing
is true and correct.**

EXECUTED this 26th day of May, 2023.

DocuSigned by:

Debra Elliott
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DEBRA ELLIOTT DECLARATION
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